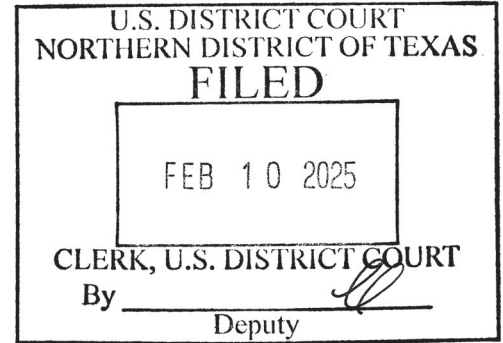


**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS FORT WORTH DIVISION**

Camilla Colleen Thomas
Plaintiff,

v.

Walmart Inc.,
Defendant.



Case No. [To be assigned] **4 - 25 CV - 116 - 0**

COMPLAINT

Plaintiff Camilla Colleen Thomas ("Plaintiff"), proceeding pro se, brings this action against Walmart Inc. ("Defendant"), and alleges as follows:

INTRODUCTION

1. This is an action for violations of the Equal Pay Act of 1963 ("EPA"), 29 U.S.C. §206(d), and Title VII of the Civil Rights Act of 1964 ("Title VII"), 42 U.S.C. §2000e et seq. Plaintiff alleges that Defendant intentionally discriminated against her on the basis of her sex by paying her less than a similarly situated male employee for equal work requiring equal skill, effort, and responsibility.
2. Plaintiff seeks compensatory damages, liquidated damages, punitive damages, and equitable relief to rectify Defendant's discriminatory practices.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action under 28 U.S.C. §1331 and 29 U.S.C. §206(d) because the claims arise under federal law.
 4. Venue is proper in this judicial district under 28 U.S.C. §1391(b) because the unlawful employment practices occurred within this district, and Defendant conducts business in this district.
-

PARTIES

5. Plaintiff Camilla Colleen Thomas was a resident of Krum, Texas. Plaintiff Camilla Colleen Thomas is now a resident of Wadsworth, Ohio. At all relevant times, Plaintiff was an employee of Defendant.
 6. Defendant Walmart Inc. is a corporation organized under the laws of Delaware with its principal place of business in Bentonville, Arkansas. Walmart operates retail locations throughout Texas, including in Fort Worth, where Plaintiff was employed at a Fulfillment Facility, now closed. Defendant may be served through its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.
-

FACTUAL ALLEGATIONS

7. Plaintiff was employed by Defendant as an Assistant Director from October 2021, to February 2023 in a Fort Worth Fulfillment Facility. Prior to that, Plaintiff was employed by Defendant as an Assistant General Manager for a Distribution Facility in Sealy, Texas from June 2019, to October 2021.
8. Plaintiff and her male peer were both hired as Assistant Directors with identical job titles, responsibilities, and functions in the Fort Worth Fulfillment facility. Plaintiff's male peer is believed to have been hired early in 2021.
9. Despite performing substantially equal work requiring equal skill, effort, and responsibility, Plaintiff was paid a base salary of ~\$125,000, which increased annually to \$130,050.37 and \$135,252.46, while her male peer was paid a base salary of \$155,000, which increased to \$161,200.04, both increases being through normal annual increases.
10. Plaintiff holds superior qualifications, including higher education degrees and certifications, which her male peer does not possess.
11. Plaintiff brought the pay disparity to the attention of her supervisor General Manager Brandon Forcier and Human Resources Manager in March 2022 and requested to receive similar pay in line with her superior qualifications.
12. During normal monthly "one on one" performance reviews in April and May, Plaintiff requested updates on the salary equalization process, and was told that it would require additional time.
13. On June 27, 2022, and July 28, 2022, Plaintiff discussed the matter with General Manager Forcier who dismissed her concerns and stated she should have "negotiated better" at the time of her hire and transfer from another Walmart facility, and that he couldn't do anything about her salary. These comments were similar in nature to those made in the same general time period by Human Resources Manager Keanna Jones.
14. On or about January 31, 2023, Plaintiff filed an ethics complaint regarding the pay disparity and requested backpay and back bonus wages. Defendant failed to provide evidence justifying the pay disparity.
15. Around the same time, Plaintiff entered a claim of violation of the EPA and Title VII with the Equal Employment Opportunity Commission. The U.S. Equal Employment Opportunity Commission ("EEOC") conducted an investigation and issued a

Determination finding reasonable cause to believe that Defendant violated the EPA and Title VII by paying Plaintiff less than her male peer for equal work.

16. During the conciliation process, Defendant agreed to pay Plaintiff \$60,000 but has failed to finalize the agreement due to disputes over non-monetary remedies, such as additional training and anti-discrimination signage in facilities.
17. Plaintiff received a Notice of Right to Sue from the EEOC on February 7th, 2025 under case number 450-2023-04125, enabling her to bring this action.

CAUSES OF ACTION

Count 1: Violation of the Equal Pay Act of 1963

18. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 1 through 15.
19. Defendant intentionally violated the EPA by paying Plaintiff less than her male peer for performing substantially equal work.
20. Defendant's actions were intentional, willful and not in good faith, entitling Plaintiff to liquidated damages equal to her unpaid wages under 29 U.S.C. §216(b).

Count 2: Violation of Title VII of the Civil Rights Act of 1964

21. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 1 through 15.
22. Defendant discriminated against Plaintiff on the basis of her sex by subjecting her to unequal pay in violation of Title VII.
23. Defendant's actions were intentional and/or taken with reckless disregard for Plaintiff's federally protected rights, entitling her to compensatory and punitive damages under 42 U.S.C. §1981a.

DAMAGES AND RELIEF REQUESTED

WHEREFORE, Plaintiff requests that this Court grant the following relief:

1. Backpay, including all bonuses, in the approximate amount of \$53,000, representing the wage disparity including bonuses from October 2021 to February 2023.
2. Liquidated damages equal to the amount of backpay and bonuses (\$53,000).
3. Punitive damages up to \$300,000 under Title VII.
4. An award of Plaintiff's costs and fees incurred in this action, including filing fees, travel expenses, and reasonable compensation for Plaintiff's time.
5. Equitable relief, including an order requiring Defendant to provide additional training to management and display anti-discrimination signage in all facilities.
6. Any other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

A handwritten signature in cursive script that reads "Camilla Colleen Thomas".

Camilla Colleen Thomas
9019 Skyline Drive
Wadsworth, Ohio 44281
cammy.thomas@aim.com

734-770-1035
Pro Se Plaintiff

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
Camilla Colleen Thomas

DEFENDANTS
Walmart Inc.

4-25cv-116-0

(b) County of Residence of First Listed Plaintiff Medina, OH
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Benton, AR
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

Pro Se Plaintiff

To Be Determined by Defendant

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Injury Product <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Equal Pay Act, 29 U.S.C. §206(d), and Title VII of the Civil Rights Act of 1964 ("Title VII"), 42 U.S.C. §2000e et seq.
Brief description of cause:
Plaintiff was intentionally paid less than similarly situated male peer.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
\$300,000+

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

Feb 8, 2025

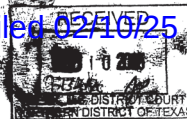
SIGNATURE OF ATTORNEY OF RECORD

Camilla Colleen Thomas, Pro Se Plaintiff

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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